

FD-302a
BALDUCCI 32354
Continuation of FD-302 of TIM BALDUCCI
On
.Page

...really substantially, that
I'll probably ~~be~~ far as 25
the press goes.

LACKEY:

Well, well the bankruptcy court
will probably take care of
that.

BALDUCCI:

I hope so.

LACKEY:

Yeah.

BALDUCCI:

I, I think, I mean I think
we're, I think we're right on
the substance of, of everything
but you know, like I said
before I just, shit I just hate
gettin' my name...

LACKEY:

Well, I...

BALDUCCI:

...drug back into all of that.

LACKEY:

...well I, I hate it for you.

BALDUCCI:

You know, just...

LACKEY:

Uh, uh, but uh, uh...

BALDUCCI:

Shit sometimes happens.

LACKEY:

...with, with JOEY's
connections, sometimes I think
he, he, he or JIM WADE
(phonetic) have stock in the,
uh TUPELO JOURNAL...

BALDUCCI:

Yeah, yeah.

LACKEY:

...because they uh, they can
get...

BALDUCCI:

They can get the ink, can't
they?

LACKEY:

Oh, they can.

BALDUCCI:

Yeah, they do.

LACKEY:

You know they...

BALDUCCI:

They get the damn...

LACKEY:

...I wonder what kind, when,
after you told me about it the

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Page

FD-302a ~~194A-6 UN~~ -32354
Continuation of FD-302 of TIM BALDUCCI

BALDUCCI:

other day, I said, I just wonder what ~~kid20f2607um~~ they gonna give JOEY.
Well, he got, yeah.

LACKEY:

Yeah. Yeah.

BALDUCCI:

He got what he wanted.

LACKEY:

Yeah.

BALDUCCI:

So we'll see.

LACKEY:

Ahh, me. Well, TIM...

BALDUCCI:

Alright, well I'ma let you go.
You stay in touch with me. Let me know...

LACKEY:

I'm going to.

BALDUCCI:

...what you need.

LACKEY:

I'm going to.

BALDUCCI:

And let me get it to you...

LACKEY:

Alright.

BALDUCCI:

...as you need it.

LACKEY:

Alright, I'ma put this in my little, I've got a little safe here that I...yeah, you know what this is?

BALDUCCI:

I've seen it several times, but I don't know. (UI) obviously it's a ballot box.

LACKEY:

Yeah. It's a jury wheel...

BALDUCCI:

Oh, a jury wheel?

LACKEY:

...from uh, from federal...

BALDUCCI:

Federal court. Delta Division.

LACKEY:

Uh-huh.

BALDUCCI:

Yeah.

LACKEY:

And my sister was up there one day and they were throwing these away...

FD-302a BALDUCCI 32354
Continuation of FD-302 of TIM BALDUCCI

Really? 09/27/2007 27

On , Page LACKEY:

BALDUCCI: Somebody was using it as candy bowls one time.

LACKEY: No that's what, that's what I've been doing...

BALDUCCI: Uh-huh.

LACKEY: ...to the candy box and uh, uh,
she...

BALDUCCI : Old jury wheel.

LACKEY: ...she got it for me. I
wouldn't take anything for it.
I've...

BALDUCCI : Yeah.

LACKEY: ...I've laughed and, and told some of 'em, I said, you know, we always accused of uh, setting juries, uh, uh, fixing juries and I got...

BALDUCCI: Mm-hmm.

LACKEY: . . . my own jury wheel.

BALDUCCI: (laughs)

LACKEY: Just pick my own one.

BALDUCCI: Isn't that somet

LACKEY: It is.

BALDUCCI: Is this the Delta, Del, Delta Division? Is that what this is?

LACKEY: Oh, I don't know what that (ui)

BALDUCCI : (01)

LACKEY: That's a, that's a whole...
No, I don't know where the
Delta Division was. What is
that? (UI)

BALDUCCI : The old Delta Division...

LACKEY: That's a....

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Continuation of FD-302a

BALDUCCI: TIM BALDUCCI

...yeah, old DELA/Division...28

LACKEY:

...662.

BALDUCCI:

...at one time, it sat in
Clarksdale and uh...

LACKEY:

Well aren't they tryin' to...

BALDUCCI:

...(UI) court. You know.

LACKEY:

...tryin' to get it moved to,
to Boliver...

BALDUCCI:

Yeah, you know, PEPPER,
PEPPER's involved in that and
uh, you know, I hadn't really
followed that that much.

LACKEY:

Uh...

BALDUCCI:

My daddy's been involved in it
over there, kinda keepin' up
with it.

LACKEY:

Yeah.

BALDUCCI:

He's the actually's been
tellin' me, tellin' me about
it. Um...

LACKEY:

What does your dad do? I...

BALDUCCI:

He's a banker. He's the
president...

LACKEY:

Ok.

BALDUCCI:

...of the bank and uh, in
Cleveland...

LACKEY:

Ok.

BALDUCCI:

...CLEVELAND COMMUNITY BANK?

LACKEY:

Yeah.

BALDUCCI:

And uh, I talked to him last
night, you'll like this. My
daddy's a big FRED THOMPSON
man.

LACKEY:

Oh yeah. Uh-huh.

BALDUCCI:

And my daddy's going to a

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Page
FD-302a 1894 A-60N - 32354
Continuation of FD-302 of TIM BALDUCCI

fundraiser in Ruleville Friday
night... 09/27/2007 29

LACKEY:

Oh yeah. FRED.

BALDUCCI:

...for FRED THOMPSON. And um,
and 'course you know, we're all
BIDEN folks.

LACKEY:

Oh, sure.

BALDUCCI:

Supportin' him big and uh, and
so my daddy's going to this
fundraiser Friday night in
Ruleville for him and I called
him the other night and said,
God damnit daddy. I said, did
you write a check? I said, I
hope you had sense enough to
give him cash and not write a
damn check so it'll come out
and the damn BIDENS will see
that my daddy's givin' money
to FRED THOMPSON. I said, I
hope, tell me you didn't have,
you weren't dumb enough to
write a check to him? He goes,
well, I did. I'm sorry. I
didn't think about it.

LACKEY:

(laughs)

BALDUCCI:

And I said well I, God damn I hope
they don't put two and two
together...

LACKEY:

(laughs)

BALDUCCI:

...and see that name and figure out
who it is. I said you killin' me.
You killin' me. See ya, judge.

LACKEY:

Thanks, bud.

BALDUCCI:

Alright, take care.

LACKEY:

Alright. You too.

BALDUCCI:

Alright. You call me...

LACKEY:

You too.

BALDUCCI:

...let me know...

LACKEY:

I'm, I'm going to.

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Continuation of FD-302 of TIM BALDUCCI
On Page LACKEY:

...how things go...
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I'm going to.
...and uh, just, man, whatever
you need. Let me know. Alright,
buddy.

LACKEY: Thanks, TIM.

BALDUCCI: Yes sir.

LACKEY: Good to see you.

BALDUCCI: Bye bye Miss MONETTE.

MONETTE (LNU): Oh, be careful.

BALDUCCI: Alright, see you later. Take care.

LACKEY: Ok, bud. I'm about thirsty to death, are you?

MONETTE (LNU): (UI)

LACKEY: What?

MONETTE (LNU): This is too dang good (UI)

LACKEY: (UI)

MONETTE (LNU): (UI)

LACKEY: (UI)

MONETTE (LNU): (UI)

LACKEY: (UI)

MONETTE (LNU): (laughs)

LACKEY: (laughs)

MONETTE (LNU): That makes the day better, then.

LACKEY: (laughs) Oh. (UI)

MONETTE (LNU): Ok.

LACKEY: (UI)

MONETTE (LNU): (UI)

LACKEY: (UI)

ED-302a
MONETTE - LNU :
Continuation of ED-302 of TIM BALDUCCI
On Page LACKEY :

(laughs) 09/27/2007 31
(laughs) Ahhh, me. I grew up a mile over that hill. Mm-hmm.
Haaa.

(pause; beeping sound in background)

MONETTE (LNU) : (UI) Yes. Sure.
LACKEY : (UI) get it?
MONETTE (LNU) : It's BILL.
LACKEY : Hello? Ok. Thanks now. (hangs up) (sighs)
MONETTE (LNU) : Can I fax something?
LACKEY : Huh?
MONETTE (LNU) : Can I fax these things or wait?
LACKEY : Wait...
MONETTE (LNU) : I'll wait.
LACKEY : (UI) Thanks. Thanks, MONETTE.
MONETTE (LNU) : Ok.
LACKEY : I'm 'bout to burn up.
MONETTE (LNU) : (laughs) This (UI). Yeah, it's on.
LACKEY : It's on, but it's, it's not doing well.
MONETTE (LNU) : Is the filter dirty? I, I guess it wouldn't be. It just feels (UI)
LACKEY : Aw, it's, it's, it just, you know (UI)
MONETTE (LNU) : Not much, but it looks pretty dirty right (UI) Well, we need another TV. (laughs)
LACKEY : (laughs) Yeah. (UI)
MONETTE (LNU) : (UI) fall through. (laughs) Come on back.
LACKEY : (UI)

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Continuation of FD-302 of
MONETTE (LNUUM: BALDUCCI)

(UI)

09/27/2007

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LACKKEY: (UI)

SPECIAL AGENT (SA) WILLIAM P. DELANEY: Did I...

LACKKEY: (UI)

SA DELANEY: ...understand him correctly?
He's leaving this weekend and
he's gon', not gonna be back
for like two weeks?

LACKKEY: Do what?

SA DELANEY: Did I understand him to say
he's leaving this weekend and
he won't be back for two weeks?

LACKKEY: That's right. Going to
Switzerland.

SA DELANEY: He's going to like, DC this
weekend?

LACKKEY: DC this weekend and the next,
next week, he's going to
Switzerland for two weeks.

SA DELANEY: When's he leave, is he gonna
be, is he gonna be around next
week?

LACKKEY: Yeah. I think he is, now. Let
me...

SA DELANEY: Ok.

LACKKEY: ...let me get this right here.
I'm nervous.

SA DELANEY: (UI) I appreciate that.

UNIDENTIFIED MALE (UM): (UI) judge?

SA DELANEY: Judge?

LACKKEY: (UI)

SA DELANEY: Hang on. Just leave it in
there.

LACKKEY: Oh.

SA DELANEY: We're gonna take some photos.

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Continuation of FD-302 of LACKEY? TIM BALDUCCI
On , Page

Ok. You have 08/08/2007 at me 33
(UI) because...

SA DELANEY: Is this stuff turned off?

LACKEY: Huh?

SA DELANEY: Is this turned off?

LACKEY: Uh-uh. No.

(END OF RECORDING)

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FEDERAL BUREAU OF INVESTIGATION

Date of

transcription

Investigation on
File #

at

Date dictated

by

agency:

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09/27/2007

The following is a recorded telephone conversation between

~~TELEPHONE NUMBER~~ and STEVE PATTERSON ~~TELEPHONE NUMBER~~

09/27/2007 Jackson, Mississippi (telephonically)

194A-JN-32354

09/27/2007

SA WILLIAM P. DELANEY/jrb

Exhibit S

FD-302a
184A-6JN-32354
Continuation of FD-302a
BALDUCCI: TIM BALDUCCI
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...um, and I ~~talked~~ 2007 BETHIE 4
(phonetic) and she said he's
gonna be there this mornin'...

PATTERSON:

Ok.

BALDUCCI:

...so, I'm gonna go back on my
way back through...

PATTERSON:

Mm-hmm.

BALDUCCI:

...and I'ma...

PATTERSON:

Oh, you're on, you're over
there now?

BALDUCCI:

Uh-huh. I'm leaving Oxford
now...

PATTERSON:

Ok.

BALDUCCI:

...heading south.

PATTERSON:

Ok.

BALDUCCI:

And um, so what I'ma do is I'ma
come back through here, I'ma
stop and see him. I'm gonna
lead with this issue and then
I'm gonna tell him I need you
to make two calls.

PATTERSON:

Yeah.

BALDUCCI:

And get him to make those two
phone calls.

PATTERSON:

Yeah. Uh, mention IUPE to him.

BALDUCCI:

Ok.

PATTERSON:

And uh, see what his reaction
is.

BALDUCCI:

Ok.

PATTERSON:

I think it'll be very positive.

BALDUCCI:

Ok.

PATTERSON:

Uh, did you ever talk to Z
(phonetic)?

BALDUCCI:

The mother fucker never called
me back STEVE. You know, he
called me on my cell phone. He

FD-302a
Continuation of FD-302 of TIM BALDUCCI

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194A&N-32354
was on his. I tried to talk to
him for about 01627 minutes... 5

PATTERSON:

Yeah, you told (UI)

BALDUCCI:

...and I said, Z, I just, I
cannot communicate with you.
I'm gettin' every third word
you're sayin'.

PATTERSON:

Mm-hmm.

BALDUCCI:

He said, well I'll be home in
about twenty or thirty minutes.
I'll call you back. And the
mother fucker never called me
back.

PATTERSON:

Alright, do you have your call
with uh, guys in Richmond?

BALDUCCI:

Yeah, I did. I did.

PATTERSON:

Any names?

BALDUCCI:

(UI) Uh, he, you know, frankly
what they were saying, what he
was saying, DONALD McKETCHEN
sayin' that uh, that the way
that the bill is being marked
right now, that in the Senate
that they're gonna get around
the cap he thinks. And he's
supposed to be faxin' me this
morning some dead man's
documents about the Senate
markings. So...

PATTERSON:

So, but in other words, what
he was sayin' was good news?

BALDUCCI:

Good news. And what he was
sayin', though, is (UI)...

PATTERSON:

He might not be accurate, but
good news.

BALDUCCI:

Well he, I think it is, 'cause
he's got fuckin'...

PATTERSON:

Ok.

BALDUCCI:

...documents and he was tellin'
me, you know, I think my intell
may be better in pressure than
yours...

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Page

FD-302a (Rev. 4-20-02)

Continuation of FD-302a

PATTERSON: TIM BALDUCCI

Mm-hmm. 09/27/2007 6

BALDUCCI: ...from what you got on the House side...

PATTERSON: Mm-hmm.

BALDUCCI: ...and he said, you know, if this is the case, we really need to push on the Senate bill and he was telling me the message was you guys gotta get your man in line on the House side if this comes out of the Senate.

PATTERSON: Yeah, well we, we can handle that.

BALDUCCI: And that's, I said, look you know, we...

PATTERSON: That's done.

BALDUCCI: ...we all for, we all for gettin' the best bill...

PATTERSON: Yeah.

BALDUCCI: ...to the floor. So.

PATTERSON: Yeah, that's done.

BALDUCCI: So yeah, so it's...

PATTERSON: (UI) that's good news. Alright. And are they gonna meet us up there three o'clock Saturday?

BALDUCCI: Yeah, and here's what we're gon' do. I've been on the phone with BIDEN this mornin', that would be JIM BIDEN. I'm not tryin' to be like JOEY.

PATTERSON: (laughs) (UI)

BALDUCCI: And um, you and I, the plan now is, me, you and NORMAN are gonna leave at eight o'clock from New Albany Saturday.

PATTERSON: Yeah.

BALDUCCI: So, I'll come pick you up Saturday morning...

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Continuation of FD-302

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Page

BALDUCCI:

Ok. 09/27/2007 7

...at your house, and we'll leave from eight, at eight o'clock from New Albany Saturday, and we're gonna get there around noon, and we're gonna meet the BIDENS around noon.

PATTERSON:

Ok.

BALDUCCI:

Then we're gonna meet the black farmers at three.

PATTERSON:

Ok.

BALDUCCI:

And we're gonna go to the dinner at seven.

PATTERSON:

Is JIMMY...

BALDUCCI:

(UI)

PATTERSON:

...and them going to the dinner with us?

BALDUCCI:

I don't know yet.

PATTERSON:

Ok.

BALDUCCI:

I don't know yet. Then um, we may or may not meet with STITH (phonetic) just me and you Sunday morning.

PATTERSON:

Ok.

BALDUCCI:

JIMMY...

PATTERSON:

That'd be fine, anyway

BALDUCCI:

...and SARAH, yeah, JIMMY and SARAH can't stay...

PATTERSON:

Yeah.

BALDUCCI:

...but um, we may or not, dependin' that he's gonna talk to STITH...

PATTERSON:

Ok.

BALDUCCI:

...and let us know, so.

PATTERSON:

Ok. That'd be good.

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Continuation of FD-302 of
BALDUCCI: TIM BALDUCCI

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So either we're gonna meet with STITH Sunday mornin' and come home or either we're gonna do nothin', just get up and come home...

PATTERSON:

Come home Sunday mornin'. Yeah, ok. Alright, good enough. That, that's good plan.

BALDUCCI:

Yeah.

PATTERSON:

Call me durin' the day.

BALDUCCI:

Alright. Bye.

PATTERSON:

Bye. (hangs up)

(END OF CONVERSATION)

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 11/05/2007

The following is a consensually recorded conversation between TIMOTHY BALDUCCI, SIDNEY BACKSTROM, ZACHARY SCRUGGS and RICHARD "DICK" SCRUGGS on November 1, 2007:

1D26

Investigation on 11/01/2007 at Oxford, Mississippi
File # 194A-JN 32354 Date dictated 11/05/2007
by SA WILLIAM P. DELANEY/jrb

194A-JN-32324

Continuation of FD-302 of TIM BALDUCCI On 11/01/2007 , Page 2

TIMOTHY BALDUCCI:

(clears throat) My name is TIM BALDUCCI. Today's date is November 1st, 2007. The time is approximately 1:20 PM, central time. I'm attempting to make a consensual recording of a conversation between myself and SID BACKSTROM (phonetic) at the SCRUGGS LAW FIRM and possibly with RICHARD SCRUGGS. (sighs)

(pause; BALDUCCI driving)

(passersby on the square; non-pertinent conversation)

BALDUCCI:

(UI) (whispering to himself)

UNIDENTIFIED MALE (UM):

(UI)

BALDUCCI:

What's happenin'?

ZACH (LAST NAME UNKNOWN) (LNU):

(UI)

BALDUCCI:

Hey man.

ZACH SCRUGGS:

You comin' up here?

BALDUCCI:

I was. I was comin' to see ya'll.

UM2:

Hey man.

BALDUCCI:

Whatcha know?

RICHARD SCRUGGS:

Good to see ya.

BALDUCCI:

How you doin'?

R SCRUGGS:

I didn't know you were here.

BALDUCCI:

Uh, yeah. Dropped by. Actually, I was comin' to see SID, but I need to see...

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Continuation of FD-302 of TIM BALDUCCI On 11/01/2007, Page 3

R SCRUGGS: Well, he's right behind us.

BALDUCCI: ...see you.

R SCRUGGS: I was supposed to call uh, TIM,
I mean uh, uh, TIM, uh...

BALDUCCI: STEVE?

R SCRUGGS: ...the other TIM.

BALDUCCI: Has he uh, he not been here?

R SCRUGGS: I just talked to him.

BALDUCCI: Oh, ok.

R SCRUGGS: He hadn't been here. (UI)

BALDUCCI: Well, he told me that he had to
come over here today and see
you about somethin'.

R SCRUGGS: Well, he was goin' to, but
he...

BALDUCCI: (sighs)

R SCRUGGS: ...called me and I've got a
call in to him now

UM: See a man about a dog.

BALDUCCI: Yeah. See a horse about a dog?

R SCRUGGS: Yeah.

BALDUCCI: We uh, gosh, we been runnin' in
such different damn directions
lately.

R SCRUGGS: This is on uh...

BALDUCCI: I hardly ever get to, to see
him.

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Continuation of FD-302 of TIM BALDUCCI, On 11/01/2007, Page 4

R SCRUGGS: ...GARY (phonetic) ANDERSON type thing.

BALDUCCI: Yeah, that's what I...

R SCRUGGS: Can I...

BALDUCCI: ...figured.

R SCRUGGS: ...can I handle this 'cause it's time critical? Give me about fifteen minutes?

BALDUCCI: Sure.

R SCRUGGS: And...

BALDUCCI: Yeah, no problem.

R SCRUGGS: ...alright. (UI).

Z SCRUGGS: Hey come, come here TIM.

BALDUCCI: No, problem. Naw, do what you gotta do. I just uh, no, no thanks. No trick or treat for me. I'ma uh...

Z SCRUGGS: Here, we'll go back in my, or SID's office. I, I'll go back there with you (UI)

BALDUCCI: No, take ya'll's time. I'm arriving unannounced, so that's fine.

Z SCRUGGS: (UI) fine. You're totally fine. You know uh, CHRIS, don't you? You've met CHRIS?

BALDUCCI: Yeah, I've met CHRIS.

CHRIS (LNU): (UI)

BALDUCCI: How you doin', bud? Good to see

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Continuation of FD-302 of TIM BALDUCCI On 11/01/2007, Page 6

know man? I wouldn't care for anything.

Z SCRUGGS: I just hate how bad our Kentucky thing turned out.

BALDUCCI: Ah, you know...

Z SCRUGGS: It's gonna happen uh, uh, gonna happen sooner or later with these guys.

BALDUCCI: Well, I'm, I'm...

Z SCRUGGS: What, what's the lat, I mean, have there been (UI)

BALDUCCI: Nothin'. I haven't heard anything, ZACH.

Z SCRUGGS: I hadn't heard...

BALDUCCI: Um, you, you know, one of the things that I was concerned about...

Z SCRUGGS: JOEY came over on Sunday (UI)

BALDUCCI: Well, I knew, I knew that and I know JOEY's been dumpin' on me a lot about that. I've talked to SID about it.

Z SCRUGGS: I told JOEY the, the frustration, anything with, I (UI) one thing. I said I wasn't gonna call, call and (UI) talked in that letter (UI) anything to do with adding you in as much as how it was posterized.

BALDUCCI: Mm-hmm. Yeah. It was...

Z SCRUGGS: (UI)

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Continuation of FD-302 of TIM BALDUCCI, On 11/01/2007, Page 7

BALDUCCI: ...tryin' to ram it down us.

Z SCRUGGS: Yeah, uh, yeah. He's, you know, we just wanna stay out of all that and, and I think ya'll do too. That's why...

BALDUCCI: Well, of course.

Z SCRUGGS: ...ya'll withdrew, you know?

BALDUCCI: Well, I'm glad you brought it up, because I had talked to SID a little bit about it and he may have told you, you know, I hate it because to me, that issue is squarely just a pissin' match between JOEY and us. And I feel like ya'll have gotten caught in the crossfire on that. And I hate it...

Z SCRUGGS: Not your fault.

BALDUCCI: Well, I, I, I hope...

Z SCRUGGS: I know its not you fault.

BALDUCCI: ...I mean, I hope you say that. I hope you mean that because...

Z SCRUGGS: And JOEY, JOEY, and, and I'll even say this and, and I could be wrong and, and you may disagree and I would, I would understand you disagreeing, you know, I, JOEY didn't intend on that consequence either, I'm sure.

BALDUCCI: I'm sure.

Z SCRUGGS: And these...

BALDUCCI: No, I...

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Continuation of FD-302 of TIM BALDUCCI, On 11/01/2007, Page 8

Z SCRUGGS: ...Kentucky guys, I mean, uh, you know that's where...

BALDUCCI: It's just a mess.

Z SCRUGGS: ...my, that's where about ninety-nine...

BALDUCCI: Yeah.

Z SCRUGGS: ...point nine percent of my frustration is on them because...

BALDUCCI: They're such rookies.

Z SCRUGGS: Well, I don't think JOEY knew or appreciated that they were gonna come in there and say...

BALDUCCI: Be that heavy handed?

Z SCRUGGS: ... (UI) comin' on ya'll's...yeah.

BALDUCCI: Yeah.

Z SCRUGGS: Uh, and, and, and he has some deniability there, there, you know, if that's the case. And he wasn't on that call. Of course...

BALDUCCI: Right.

Z SCRUGGS: ...I wasn't, but I'm, hell, I trust completely anything you and DAVID tell me about what happened.

BALDUCCI: Sure.

Z SCRUGGS: And both you and DAVID independently and together said

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Continuation of FD-302 of

TIM BALDUCCI

, On 11/01/2007 , Page 9

that was a wild ass call. And,
and...

BALDUCCI :

Well.

Z SCRUGGS :

...that's really what it comes
down to. Do we wanna be workin'
with those guys and those guys
forwarding everything we say on
to JOEY and misrepresentin' it?

BALDUCCI :

Yeah. And I just hate it. I
mean it's just a terrible
situation, but I just wanna
make sure...

Z SCRUGGS :

I wonder what they're doing
now?

BALDUCCI :

...that you guys...ah, hell if
I know. You know, good luck for
'em.

Z SCRUGGS :

I figured you would at least
heard somethin' by now.

BALDUCCI :

I hadn't heard a thing from any
of 'em.

Z SCRUGGS :

Ok.

BALDUCCI :

But I just wanna make sure you
guys, I hope you guys don't
hold it against us...

Z SCRUGGS :

No. Ya'll are the reason...

BALDUCCI :

...for what happened. You know?

Z SCRUGGS :

...ya'll got us in that deal.
We weren't gonna...

BALDUCCI :

I know, but you know, the
problem is like I said, you
know, we were dumb and happy...

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Z SCRUGGS: (UI) (talking simultaneously)

BALDUCCI: ...and movin' along.

Z SCRUGGS: I figured that, I figured that quite (UI)

BALDUCCI: Until JOEY raised his, you know, raised his head in all of it.

Z SCRUGGS: (talking simultaneously) Yeah. And it's, and, and, and, and it's unfortunate that, that JOEY did that. I think even though JOEY's motives and get involved in the first place were, were probably mixed. One, to get in a good deal and two, kinda do this to ya'll...

BALDUCCI: Yeah.

Z SCRUGGS: ...I don't think he intended how they, how it ended up happenin'. Uh, you know, everybody, you know, Kentucky and JOEY created a monster that I don't know if they understood they created. But ya'll had nothin' to do with it. And, and I, I didn't want ya'll to be blindsided about us withdrawin', but we just, on Friday, after I talked, we were like, and, and, and then JOEY sent that email. I was like, shit. We gotta...

BALDUCCI: Yeah.

Z SCRUGGS: ...'cause JOEY, 'cause, you know, JOEY...what prompted it was I don't, I guess SID told you JOEY sent a email sayin'

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yeah, you know, saying this or
that (UI)

BALDUCCI : Right.

Z SCRUGGS : We were like whoa. (laughs)
Alright, this is too far.

BALDUCCI : Yeah. Yeah, basically he
would...

Z SCRUGGS : And that happened after we had
all talked.

BALDUCCI : ... (talking simultaneously) he,
he, yeah. Basically, JOEY
wouldn't go away quietly. He
kinda dug in on the friendship
deal and (sighs). Well I hate
it, but such is the case.

Z SCRUGGS : There's a lot of good stuff we
can get involved in.

BALDUCCI : Naw, we'll move, we'll move on.

Z SCRUGGS : And there's no way that, I knew
that, that JOEY came in under
those kinda terms, but ya'll
ain't gonna stand for it. And
we couldn't, in good faith,
stay in a deal that ya'll
brought us into. We didn't know
these Kentucky guys.

BALDUCCI : Yeah. Well, it's just a mess
and I hate it and I think, I
think we both got knocked out
of a...

SIDNEY BACKSTROM : Hey.

BALDUCCI : ...out of a good project,
but uh...

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Z SCRUGGS: Well...

BALDUCCI: ...you know, it's one of those things.

Z SCRUGGS: ...it ain't gonna succeed without all of us. I know that.

BALDUCCI: My man.

BACKSTROM: What's happenin', dude?

BALDUCCI: SIDNEY ALLEN BACKSTROM.

BACKSTROM: Um, that's real cool about how ya'll uh, just walked past your co-counsel there and didn't even say hello.

BALDUCCI: Who?

BACKSTROM: DAVID (UI) McMULLEN. In BARRETT's office.

Z SCRUGGS: I didn't even see him.

BACKSTROM: (laughs) He, ya'll walked right by. He's like hey, DICK, ZACH...

BALDUCCI: (laughs)

BACKSTROM: ... (laughs)

BALDUCCI: Nice.

Z SCRUGGS: Really?

BALDUCCI: Nice.

Z SCRUGGS: Shit, well...

BACKSTROM: I said, dude, they...

Z SCRUGGS: ...let's get his ass up here.

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I didn't...

BACKSTROM: I don't know why they don't like you. I...

BALDUCCI: Hey, you guys are a class act.

BACKSTROM: I (laughs).

Z SCRUGGS: I only saw a kind of a side angle. I mean, I was like, he kinda looks familiar, but didn't think anything of it.
(UI)

BACKSTROM: Yeah.

Z SCRUGGS: (UI) My bad

BACKSTROM: Where'd you get this from?

Z SCRUGGS: Oh, uh, a whole bunch of 'em in the um...

BALDUCCI: Trick or treating.

Z SCRUGGS: Yeah. You want? I mean, there's...

BACKSTROM: Where, in our office?

(telephone ringing in background)

Z SCRUGGS: Yeah. Both at the uh, right by the uh, the phone and, and uh, ANGELA's office, so.

BACKSTROM: Gonna get me some DOTS. You want some?

Z SCRUGGS: Yeah. Come on.

BALDUCCI: You know I'm good.

BACKSTROM: When did you get here?

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BALDUCCI : I just, literally, just walked up.

Z SCRUGGS : (UI) (talking simultaneously)

BALDUCCI : And saw them. They were...

Z SCRUGGS : I really didn't'. I was like who?

BALDUCCI : No.

BACKSTROM : I thought you were comin' before lunch?

BALDUCCI : Well, I got tied up. You know how it is. I had, jeez.

BACKSTROM : (laughs)

Z SCRUGGS : Like a celebrity.

BALDUCCI : (laughs)

Z SCRUGGS : He just, he just tried to hire uh, LINDA away but he, but LINDA didn't hear him say that he was gonna cut your salary.

LINDA (LNU) : Hey, I'll take it if I can cut my hours. (laughs)

BACKSTROM : (laughs)

BALDUCCI : Listen I, now, hey VICKI.

VICKI (LNU) : Hi, TIM.

Z SCRUGGS : Of course (UI) (talking simultaneously) work.

BALDUCCI : Not much. How you doin'?

VICKI (LNU) : (UI)

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BALDUCCI :

Nah, I told her uh, I said workin' for me is probably worth half the pay of workin' around here.

VICKI (LNU) :

(laughs)

BALDUCCI :

She'd probably uh, jump at the chance to...

BACKSTROM :

LINDA's already workin' for you. She just doesn't know it yet.

BALDUCCI :

...get away from you. Robber barons.

(All laugh)

BALDUCCI :

(laughs)

BACKSTROM :

You and your New Orleans filing.

BALDUCCI :

I'm fixin' to get that all cleaned up, too.

BACKSTROM :

Yeah, good.

BALDUCCI :

That's gonna get all...

BACKSTROM :

I appreciate that.

BALDUCCI :

...it's gonna get all cleaned up. Gettin' a little sugar rush there?

BACKSTROM :

(U1) (talking simultaneously)
Mm-hmm.

BALDUCCI :

Uh, I'm sorry I didn't make it here earlier. Is that alright? You uh...

BACKSTROM :

No, that's fine. I mean, I, I

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just, in fact, I wish I was went to lunch and I was like I thought he was supposed to come for lunch.

BALDUCCI : I was (sighs). But do you have time now? You got...

BACKSTROM : Mm-hmm.

BALDUCCI : ...a little bit of time?

BACKSTROM : Mm-hmm.

BALDUCCI : I got just a couple things that I wanted to run through with you. Um, first things first. Ok, let me tell you about the deal with...

BACKSTROM : Here's a check for...what?
(laughs)

BALDUCCI : Yeah. That (laughs)...no. First things first. Let me tell you about the deal with Judge LACKEY. Ok?

(cellular telephone ringing in background)

BALDUCCI : Um...what is that? Your cell phone?

BACKSTROM : Mm-hmm.

BALDUCCI : Sounds like STAR TREK.

BACKSTROM : Mm-hmm.

BALDUCCI : Alright.

BACKSTROM : (UI)

BALDUCCI : You may know this already, but

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just from your channels through your attorneys, but are, you know, I came here a week ago and I dropped off an order that he was signing, he had signed. And he had told me that, he said, you know, go take this, you know, go in peace and it's gonna get filed in the next couple of days. Well, apparently before MONETTE filed that order, GRADY filed a bunch of stuff. Do you know about this?

BACKSTROM: I know he filed (U1)a proposed order. I never saw it.

BALDUCCI: Alright, well, I went down there this mornin' to judge's office and there was a...

BACKSTROM: Mm-hmm?

ZACH: If ya'll need to...just talk...

BALDUCCI: No. Uh-uh.

BACKSTROM: Mm-mmm. No.

BALDUCCI: Course not. Course not. Come on in. Um...

ZACH: Yes?

ZACH: (U1)

ZACH: Let me get that. Ok. Put in my office. (closes door)

BALDUCCI: Ok, anyway, um, so apparently anyway before, before he, MONETTE filed that order, GRADY filed a bunch of shit.

BACKSTROM: Mm-hmm.

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BALDUCCI:

So judge called me and he said,
look, we need to talk again.
There's been a change.
Everything's still cool, but...

BACKSTROM:

Mm-hmm.

BALDUCCI:

...it's fine, but I gotta make
a change. So what he has done
is he's, he's prepared another
order and it, it, change, and I
got it. This is it. And it just
adds some language where he has
contemplated and looked at the
stuff that GRADY filed...

BACKSTROM:

Mm-hmm.

BALDUCCI:

...and he still, you know,
still movin' it to arbitration,
but he just added a paragraph
here in the conclusion part.
This paragraph right here.

(pause)

BACKSTROM:

Yes. That's fine.

BALDUCCI:

Alright, well what he wanted me
to know, he said, you know, he
wanted me to review it before
he entered it and see you know,
is this ok...

BACKSTROM:

Mm-hmm.

BALDUCCI:

...like it is and 1, frankly, I
just didn't know enough about
the facts to know if that was
gonna be ok.

BACKSTROM:

Mm-hmm.

BALDUCCI:

So I wanted somebody here to
review it and look at it.

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BACKSTROM:

The only thing that's a little bit curious to me (ZACH enters) is it says, complainant never requested relief by this court or any other court. (close door)

BALDUCCI:

ZACH, let me bring you up to speed.

BACKSTROM:

(UI)but chose to disregard this (UI) that doesn't make any sense.

BALDUCCI:

Alright, this is on the Judge LACKEY deal. Ok? You know, I came by here last week and I gave you an order that the judge was gonna enter. Well apparently before MONETTE got it entered, got it sent down here, GRADY filed a bunch a more shit in the case, ok? And so the judge called me and wanted me to come back down there and he's redone a new order. And what it is, it's just a change, everything's still ok, still the same deal...

ZACH:

Mm-hmm.

BALDUCCI:

...but he wants, he, he wanted me to approve this new language, basically saying that he's reviewed the new filings that GRADY has done, considered those and he still...

Z SCRUGGS:

What were the new filings?

BALDUCCI:

I don't know. He had 'em. He showed, I didn't read 'em, but

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there was a, probably an inch worth of stuff that GRADY had filed. And it just...

BACKSTROM: (UI) only (UI)

BALDUCCI: ...that beat...

BACKSTROM: (UI) attached (UI) order to whatever he filed. But we attached a proposed order in response (UI) The DANIEL COKER guys (UI)

Z SCRUGGS: So they, they know what it, I mean, they never reported to us what it was about. Maybe, must not been important. I don't know.

BACKSTROM: I mean, they just copied us on what they filed in response, saying...

Z SCRUGGS: So he's drafted a new order addressing...

BALDUCCI: Addressing that recent filing and he, he wanted me to approve it. Well, the problem is, I didn't know, 'cause I didn't, I didn't have the institutional knowledge of the case to really know if it was ok or not. So I wanted ya'll to look at it and tell me if it's ok and if not, make whatever edits need to be made to it...

BACKSTROM: (clears throat)

BALDUCCI: ...before I get...

BACKSTROM: This is the only...

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BALDUCCI :

...get it entered.

BACKSTROM :

thing that doesn't makes sense. The plaintiff never requested relief by this court or any relief by this court or any other court but chose to disregard the clear language and intent of the joint venture agreement and filed the action sub (U) justice. So (U). That doesn't make any sense. It's not a bad thing for us, but doesn't make any sense.

Z SCRUGGS :

That's a good thing.

BACKSTROM :

Well he's saying they didn't file anything with this court. Instead, they chose to file this court (laughs), with this court. (laughs)

BALDUCCI :

Apparently, I don't, yeah I don't understand that either.

BACKSTROM :

(laughs)

Z SCRUGGS :

Oh, ok.

BALDUCCI :

Maybe, maybe he's saying...

Z SCRUGGS :

The first part doesn't make sense.

BALDUCCI :

...maybe he's saying they didn't file a demand for arbitration with this court.

Z SCRUGGS :

(U)

BALDUCCI :

Or re, I don't know what he's trying to say.

BACKSTROM :

Uh, yeah, maybe. Maybe.